

5. "As evidenced by the Certificates of Service on file with the Court, the Defendants were personally served with the summons and a copy of the Complaint on April 22, 2022.
6. "Defendants' deadline to answer Plaintiff's Original Complaint or to otherwise file a responsive pleading to Plaintiff's Original Complaint was due thirty (30) days from the date the summons was issued. Thus, Defendants were required to file an answer or other responsive pleading on or before May 19, 2022.
7. "Neither Defendant filed an answer or other responsive pleading, on or before May 19, 2022.
8. "On May 26, 2022, Plaintiff filed his Request for Entry of Default.
9. "On June 24, 2022, the Clerk entered default against Defendants Techrover, Inc. and Keyvan Parsa.
10. "The following exhibits attached to Plaintiff's Motion for Default Judgment are true and correct copies of the originals:
 - a. Exhibit "A" - Plaintiff's Original Complaint, filed of record on April 19, 2022 at Docket No. 1;
 - b. Exhibit "B" – Summons issued on April 19, 2022, at Docket No. 2;
 - c. Exhibit "C" – Certificate of Service for Defendant Techrover, Inc, which was personally served on its registered agent on April 22, 2022, at 810 N. Kansas, El Paso, Texas 79902, along with a copy of Plaintiff's Original Complaint, at Docket No. 3;
 - d. Exhibit "D" - Certificate of Service for Keyvan Parsa, which was personally served on April 22, 2022, at 810 N. Kansas, El Paso, Texas 79902, along with a copy of Plaintiff's Original Complaint, at Docket No. 4;
 - e. Exhibit "E" – Plaintiff's Request for Entry of Default, filed of record on May 26, 2022, at Docket No. 5;
 - f. Exhibit "F" – Court's Order To Seek Default, filed on June 24, 2022, at Docket No. 9;
 - g. Exhibit "G" – Clerk's Entry of Default, filed on June 24, 2022, at Docket No. 10;
 - h. Exhibit "I" – Certificate of Last Known Address for Keyvan Parsa and Techrover, Inc.; and
 - i. Exhibit "J" – Statement of Financial Affairs filed by Westmount Group, Inc. filed the Debtor's bankruptcy case and sworn to under penalty of perjury.

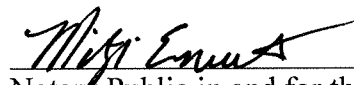
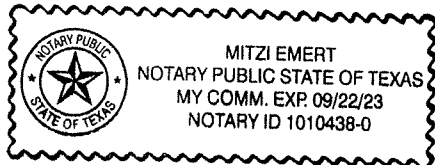
11. "As set forth in the Debtor's Statement of Financial Affairs ("SOFAs"), Debtor transferred \$450,000 to Defendant Techrover, Inc. on June 8, 2021, and Debtor transferred \$190,444.65 to Defendant Keyvan Parsa on August 23, 2021. These transfers occurred prior to or after the Debtor filed its voluntary petition under the Bankruptcy Code.
12. "Keyvan Parsa, appearing as the Debtor's corporate representative at the meeting of creditors, testified under oath about the transfers.
13. "As Chapter 7 Trustee, I conducted the creditors' meeting of the Debtor. Defendant, Keyvan Parsa, appeared as the representative of the Debtor and testified at the creditors' meeting. I have also had multiple telephone conversations with Keyvan Parsa during the case. Additionally, Keyvan Parsa has appeared and participated at several hearings before the Court prior to and after the Debtor's case was converted to chapter 7. Based on my interactions with Keyvan Parsa and his participation in the Debtor's bankruptcy case, I have personal knowledge that Keyvan Parsa is not a minor, an incompetent person, or in military service."

Further Affiant Sayeth Naught.



Brad W. Odell, Chapter 7 Trustee

SWORN TO and SUBSCRIBED before me on this the 1st day of July 2022, by Brad W. Odell, as Chapter 7 Trustee.


Notary Public in and for the State of Texas